

Quentin M. Rhoades  
State Bar No. 3969  
Robert Erickson  
State Bar No. 9966  
Rhoades, Siefert & Erickson PLLC  
430 Ryman Street  
Missoula, Montana 59802  
Telephone: (406) 721-9700  
[qmr@montanalawyer.com](mailto:qmr@montanalawyer.com)  
[erickson@montanalawyer.com](mailto:erickson@montanalawyer.com)

*Pro Querente*

**UNITED STATES DISTRICT COURT  
DISTRICT OF MONTANA, MISSOULA DIVISION**

**STEVE NELSON, MICHAEL  
BOEHME, and BONNER  
PROPERTY DEVELOPMENT, LLC,**

Plaintiffs,

**vs.**

**PROJECT SPOKANE, LLC, and  
SEAN WALSH,**

Defendants.

Cause No. **CV 20-82-M-DWM**

***DECLARATION OF RYAN ALTER***

Per MONT. CODE ANN. § 1-6-105, I, Ryan Alter, declare as follows:

1. I am over the age of 18 and am prepared to testify as to the following in court if asked to do so.
2. I have over 23 years of experience in the computer and technology industry.

3. I was employed as the Director of Academic Information Technology at The University of Montana between 1996 and 2005. I was responsible for all academic technology for the university. My duties included designing how new technology would be integrated into the classroom. As part of those duties, I investigated technology and technology equipment prices. I negotiated with vendors for the purchase of computer and other technology equipment across all academic departments.

4. I started Alter Enterprise in 2006 and am the chief executive officer. Alter Enterprise is a managed service provider of all things IT. Among other things, I and Alter Enterprise investigate and purchase computers and technology related equipment for our customers and our own needs.

5. I have previously engaged in cryptocurrency mining on my own behalf for nearly six years.

6. I have provided training to banks, small business owners, and other industries related to cryptocurrency blockchain and mining.

7. Over the years, I estimate that I have been involved with purchasing over a million computer servers and other components. Among other things, I have assisted clients with purchasing servers (miners) from Bitmain and other cryptocurrency equipment providers.

8. I am familiar with Bitmain Antminer S17+ servers (miners) (the “Servers”), which are the type of servers I understand are at issue in a portion of this lawsuit.

9. I was asked to provide an opinion as to the value of the Servers at certain different time periods.

10. To provide this opinion, I relied on my education, training, knowledge, skill and experience in the industry. I also researched current Bitmain pricing. I had my staff conduct additional research on this type of server and the warranty on this type of server, which they reported to me. We also reviewed internet sites where persons and entities offer for sale cryptocurrency mining servers and other cryptocurrency related equipment. I and my staff also asked other cryptocurrency miners about their interest in purchasing servers of this type and what they would be willing to pay. I also considered current Bitcoin mining conditions.

11. In my opinion, the fair market value of 1,493 Servers, as of today, assuming a telephone auction occurring upon fifteen days’ notice with a medium amount of internet advertising, is \$600 per unit, or \$895,800.

12. In my opinion, the fair market value of 1,493 Servers six months from now, assuming the same conditions, is \$360.00 per unit, or \$537,480. This is a standard depreciation of bitcoin miners (the servers) over this period of time based upon current market conditions.

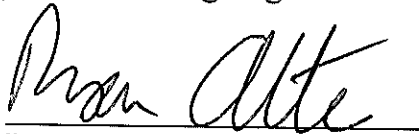
13. In my opinion, the fair market value of the Servers twelve months from now, assuming the same conditions, is \$240.00 per unit, or \$358,320. This is a standard depreciation of bitcoin miners (the servers) over this period of time based upon current market conditions.

14. These numbers would not significantly change if additional days of notice were provided for the hypothetical sales.

15. Part of the reason for the current value of the servers (miners) is that they have only a six-month warranty. Moreover, that warranty is provided only to the original owner, and is not transferrable.

#### VERIFICATION

Per MONT. CODE ANN. § 1-6-105, I, Ryan Alter, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

A handwritten signature in black ink, appearing to read "Ryan Alter", is written over a horizontal line.

Ryan Alter  
Missoula, Montana  
June 24, 2020